

**From:** [Rose Longoria](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#)  
**Subject:** [Fwd: Preliminary R2 data gaps]  
**Date:** 03/15/2007 04:58 PM

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Hi Eric -

Below is Ridolfi's preliminary list of R2 rpt issues. Ray and I still need to review and discuss this issues but I wanted to make sure you had this information. I'm out of the office on Friday but will be available Monday. Also, feel free to contact Sheila directly if you have any questions.

Take care,  
rose

----- Original Message -----

**Subject:** Preliminary R2 data gaps  
**Date:** Thu, 15 Mar 2007 16:21:32 -0700  
**From:** Sheila Fleming <[sheila@ridolfi.com](mailto:sheila@ridolfi.com)>  
**To:** 'Rose Longoria' <[rose@yakama.com](mailto:rose@yakama.com)>, 'Ray Givens' <[raygivens@givenslaw.com](mailto:raygivens@givenslaw.com)>  
**CC:** 'Tom Bowden' <[tom@ridolfi.com](mailto:tom@ridolfi.com)>

Dear Rose and Ray,

As we discussed during our teleconference on Tuesday, Tom and I have assembled a very preliminary list of R2 Data Report potential data gaps for you to provide to Eric. Please be advised that we are still reviewing the report and will likely identify other issues through our review and our participation in review meetings with the government team. As we progress in our review, we will provide detailed information regarding data gaps that you determine are of particular importance to the Yakama Nation.

1. Pathways from upland sources. Currently there appears to be insufficient data for most of the upland sites to determine or confirm pathways to river resources, including the groundwater pathway.
2. Background (surface water and sediment). LWG has presented preliminary background concentrations for these media; however, the R2 report states that these values will not be used in the RI and that they will need to collect additional data in Round 3 to develop a comprehensive background determination. It appears that LWG is not proposing to collect additional fish tissue background data. Ridolfi is conducting review of the R2 data and previous reports to determine if we agree that no additional fish tissue background samples are needed.
3. PCBs levels in fish tissue. Based on data presented in Sections 6.4.3.6.1 and 6.4.2.6.1, the PCB tissue concentrations in the study area samples appear to be roughly an order of magnitude higher than the upstream samples. Ridolfi is conducting further review of the fish tissue data to be better able to articulate this data gap and what type of additional sampling may be needed, particularly as related to background.
4. Groundwater plume contribution. The R2 Report concludes that the contribution from contaminated groundwater to surface water is not significant, primarily because of dilution. It's not clear from our initial review what other groundwater concerns exist. For example, are contaminants in groundwater contaminating transition zone sediments or will they likely do so after sediment remediation?

5. Stormwater. We recognize at this point that stormwater sampling is ongoing, however we believe we need to track this topic closely because stormwater may be a significant source of surface water and sediment contamination.

Please call me if you would like any additional information.

Sheila

**Sheila Fleming, P.E.**

*Environmental Engineer*

**RIDOLFI Inc.**

*Engineers and Scientists Concerned with the Earth*

1011 Western Avenue, Suite 1006

Seattle, WA 98104

P. 206.682.7294 / F. 206.682.5008

[www.ridolfi.com](http://www.ridolfi.com)

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rose m. longoria

Superfund Projects Manager

Fisheries Resource Management Program

Yakama Nation

PO BOX 151

Toppenish, WA 98948

Phone: 509-865-5121 x6365

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